

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

**IN RE:**

**MEDINA MALDONADO, MAGALY**

**DEBTOR(S)**

**CASE NO. 10-04975 BKT**

**CHAPTER 7**

**APPLICATION FOR LEAVE TO EMPLOY REALTOR  
PURSUANT TO RULE 2014 OF THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

COMES NOW, Noemí Landrau Rivera, Chapter 7 Trustee in the instant case and before this Court most respectfully sates and prays:

1. Debtor filed for bankruptcy relief under Chapter 13 on June 7, 2010. Case was converted to a Chapter 7 on May 14, 2012. The undersigned was duly appointed as Trustee in the above captioned proceeding.
2. Trustee seeks to employ real estate broker, Josué I. Figueroa Sierra, license no. 9041A to act as agent for the sale of real properties described in Schedule A as:
  - a. RESIDENTIAL PROPERTY LOCATED AT URB. INTERAMERICANA, AA34, 26 STREET IN TRUJILLO ALTO, PUERTO RICO. THIS PROPERTY CONSISTS OF THREE BEDROOMS, 1.5 BATHROOMS, LIVING ROOM, DINING ROOM, KITCHEN AND GARAGE.
3. Employment of real estate broker is beneficial to the estate and is necessary and beneficial to the estate in order to sale real properties.
4. To the best of applicant's knowledge the realtor, Josué I. Figueroa Sierra, has no connections with Debtor, Creditors, Trustee or any other party in interest in these proceeding and his professional services within his appointment will no harm or cause undue prejudice upon creditors, debtor, Trustee, the bankruptcy estate or any other party in interest. He does not represent or hold any interest adverse to the herein estate and is a disinterested persons as defined in section 101(4) and 327 of the Bankruptcy Code.

5. The fee to be paid to realtor is of five percent (5%) of the gross sales price to be paid by the estate after application, notice and hearing, and allowance by the Court.

WHEREFORE, applicant prays that this Court grant this request and enter an order authorizing the employment of real estate broker, Josué I. Figueroa Sierra, as real estate broker for the sale of the abovementioned property.

**NOTICE**

Applicant hereby gives notice that unless a written objection is filed in Court, within twenty-one (21) days of this Notice, the Court may enter an order granting the instant request without further need for a hearing.

TRUSTEE HEREBY CERTIFIES: that this motion has been filed using the Bankruptcy Court's ECF/ECM electronic filing system who will automatically notify all participants to said system; All other parties included in attached master address list who are not participants of the Court's automatic filing system shall be notified via regular mail on this same date.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 11<sup>th</sup> day of January, 2013.

***/s/ Noemí Landrau Rivera***

Noemí Landrau Rivera

Chapter 7 Trustee

PO Box 270219

San Juan, PR 00927-0219

Tel. (787) 774-0224 // Fax (787) 793-1004

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**IN RE:**

**MEDINA MALDONADO, MAGALY**

**DEBTOR(S)**

**CASE NO. 10-04975 BKT**

**CHAPTER 7**

**VERIFIED DECLARATION UNDER PENALTY OF PERJURY**

TO THE HONORABLE COURT:

I, JOSUE I. FIGUEROA SIERRA, real estate broker, declare under penalty of perjury as follows:

1. I am a real estate broker authorized to exercise such profession by the laws of the Commonwealth of Puerto Rico, by the “Junta de Corredores, Vendedores y Empresas de Bienes Raíces” of the Commonwealth of Puerto Rico under license number 9041A. The exercise of said licenses have in no way been restricted or limited.

2. I maintain offices at Carr. 176, Km. 6.7, Camino Luciano Vázquez, San Juan, PR 00926, Tel. (787) 462-9152.

3. Prior to the date of applicant’s engagement as realtor, I had no connections with the Debtor, Debtor’s attorney, creditors, US Trustee, Chapter 7 Trustee or any other party in interest.

4. That to the best of my knowledge and belief, I am a “disinterested person” as per Section 101(14) of the Bankruptcy Code, which definition is incorporated herein by reference, and I do not have any connection to any creditor or debtor in this case, nor any party in interest herein, nor anyone acting on their behalf whose interest may be adverse to Debtor’s estate, and I do not represent or hold any interest adverse to the Debtor or the estate, with respect to the matter on which I am to be employed as professional, pursuant to 11 U.S.C. § 327(a).

5. I have not received or been promised transfer, assignment, pledge of property of the Debtor or the estate, except as for compensation as set forth herein to be made at five percent (5%) of the gross sale price of the property.

6. I have not agreed to share with any person the compensation to be paid for the services rendered in this case.

7. The terms of the compensation agreed to are as follows: no more of five percent (5%) of the gross sales price.

8. I will amend this statement immediately upon my learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstances relating thereto.

9. I have reviewed the provisions of LBR 2016-1 and under penalty of perjury affirm that I comply with the requirements of the Bankruptcy Code and the local rules to work as a professional broker in this case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11<sup>th</sup> day of January, 2013.

**NOTICE**

Realtor hereby gives notice that unless a written objection is filed in Court, within twenty (20) days of this Notice, the Court may enter an order granting the instant application without further need for a hearing.



JOSUE I. FIGUEROA SIERRA  
LIC. NO. 9041A  
METROHOMES  
RR6 BOX 9306  
SAN JUAN, PR 00926  
Tel. (787) 462-9152  
jifigueroa07@gmail.com

## **Josué I. Figueroa-Sierra**

787-462-9152

jifigueroa07@gmail.com

RR 6 Box 9306, San Juan, Puerto Rico 00926

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### **REAL ESTATE EXPERIENCE**

2000 - Present  
Independent Realtor  
MetroHomes  
RR6 Box 9306  
San Juan, PR 00926  
787-462-9152

#### **Broker**

Generate comparable market analysis, prepare, present and implement marketing plans, elaborate pricing strategies, articulate financial options • Assist in the evaluation of sale offers and/or rental proposals. Draft and negotiate contracts, break down contractual terms and conditions. • Provide due diligence not limited to research of ownership, deed type, legal description, land use coding, deed restrictions, public records, zoning, utilities, lot size and survey, easements, property lines, rights-of-way. • Document acquisitions.

#### **Property Management**

Assess condition of properties to recommend re-conditioning, market, rental rate, capital improvements, corrective maintenance, repairs. • Advertise, show vacancies, screen suitable tenants, execute leases, secure rents, follow up delinquency, assists evictions. • Address preventive maintenance, emergency repairs, safety compliance, city ordinances, tenants issues and complaints. • Administer finances respecting services rendered, bank deposits, preparation of monthly income statements, variance reconciliation, disbursement reports.

### **OTHER EXPERIENCE – MANAGEMENT**

1996 - 2000  
Technical Ops Manager  
Pegasus Communications  
5 Radnor Corp Center  
Radnor, PA 19807  
610-934-7000

#### **Technical Operations Management**

Directed, managed and supervised cable television technical operations: engineering, construction, maintenance, service, repair, installation, warehouse, dispatch. • Planned and administered annual 1.3M operational and 1.6M capital budgets. • Solicited, reviewed and approved all outside contractor bids and vendors. • Monitored construction practices, use of material and equipment, safety compliance, quality control and assurance. • Final approval on employee hiring, promotion, compensation, separation. • Developed and implemented guidelines for training, work performance and employee evaluation for in-house staff of 26.

### **EDUCATION**

Bachelor of Arts, Magna Cum Laude, Universidad Teológica del Caribe, San Juan, PR  
Real Estate Broker, 90 Hours, Course, TIRI Real Estate Institute, San Juan, PR  
Real Estate Principles and Practices, 72 Hours, Continuing Education, San Juan, PR

### **CONTINUING EDUCATION COURSES OF INTEREST**

Technology in Real Estate, Business Administration, Social Interest and Subsidy Programs, Real Estate Contracts, Short Sales, Fair Credit, FHA Loans, Appraisal and Valuation, Corporate Identities, Conflict Management, Business Ethics, Creative Finance, Law & Regulation.

### **PROFESSIONAL SKILLS**

Proficient in Excel, PowerPoint, Word • Fully Bi-lingual English/Spanish • RE Broker License

Label Matrix for local noticing  
0104-3  
Case 10-04975-BKT7  
District of Puerto Rico  
Old San Juan  
Thu Jan 10 09:59:39 AST 2013

DORAL BANK  
PO BOX 70308  
SAN JUAN, PR 00936-8308

UNITED STATES TRUSTEE  
500 TANCA ST STE 301  
SAN JUAN, PR 00901-1922

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

ASOCIACION EMPLEADOS ELA  
PO BOX 364508  
SAN JUAN, PR 00936-4508

CLARO  
PO BOX 360998  
SAN JUAN, PR 00936-0998

DEPARTAMENTO DE HACIENDA  
PO BOX 9024140  
SAN JUAN, PR 00902-4140

DORAL FINANCIAL CORP  
1451 F D ROOSEVELT AVENUE  
SAN JUAN, PR 00920-2717

Department of Treasury  
Bankruptcy Section (Suite 1504)  
235 Ave. Arterial Hostos  
San Juan Puerto Rico 00918-1451

GE Money Bank  
c/o Recovery Management Systems Corporat  
25 SE 2nd Ave Suite 1120  
Miami FL 33131-1605

PR ACQUISITIONS LLC  
250 MUNOZ RIVERA AVENUE SUITE 1200  
HATO REY PR 00918-1814

SAMS CLUB  
PO BOX 981400  
EL PASOO, TX 79998-1400

SCOTIABANK DE PUERTO RICO  
PO BOX 2649  
SAN JUAN, PR 00936-2649

MAGALY MEDINA MALDONADO  
URB INTERAMERICANA  
AA34 26 STREET  
TRUJILLO ALTO, PR 00976-3402

MONSITA LECAROEZ ARRIBAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

NOEMI LANDRAU  
US TRUSTEES OFFICE  
PO BOX 270219  
SAN JUAN, PR 00928-3019

ROBERTO FIGUEROA CARRASQUILLO  
PO BOX 193677  
SAN JUAN, PR 00919-3677

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)DORAL BANK  
PO BOX 70308 SAN JUAN, PR 00936-8308

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